

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CRIMINAL ACTION
v.)	
)	NO. 04-10299-05-PBS
ANDRES MARTINEZ,)	
)	

**GOVERNMENT'S MOTION FOR AN ADDITIONAL SEVEN DAYS
TO PROVIDE PROBATION WITH A STATEMENT OF RELEVANT FACTS**

The United States respectfully moves this Court for an additional two weeks to provide Probation with a statement of relevant facts for defendant ANDRES MARTINEZ. In support, the government submits the following:

1. On December 1, 2005, defendant MARTINEZ pled guilty pursuant to a plea agreement with the government. The court ordered the government to provide U.S. Probation with a statement of relevant facts and other Fed. R. Crim. P. 32(b)(4) materials by December 8, 2005.

2. The instant case involves a complicated fact pattern involving Title III interceptions over several different telephones used by MARTINEZ, controlled purchases of cocaine and surveillance. Because of the complex nature of the evidence, additional time is required to provide Probation with an accurate and complete statement of relevant facts.

Respectfully submitted,

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